

REMARKS/ARGUMENTS

The Examiner is thanked for the performance of a thorough search.

By this amendment, Claims 1, 13, 34, 38, and 39 are amended, and no claims are added or canceled. Hence, Claims 1, 2, 4-18, 20-32, and 34-47 are pending in the application.

I. SUMMARY OF THE INTERVIEW

The Examiner is thanked for the telephone interview conducted May 1, 2008. In the telephone interview, representatives for the Applicants and the Examiner discussed proposed amendments to Claims 1 and 34 that are made herein. For example, the representatives discussed how the amendment to clarify how segments are established distinguishes segments in Claim 1 from blocks and tiles in the cited reference. No agreement about allowance was reached.

II. SOLE REJECTION

Claims 1, 2, 4-18, 20-32, and 34-47 stand rejected under 35 U.S.C. § 103(b) as allegedly being anticipated by International Publication Number WO 01/33427 to Roccaforte ("*Roccaforte*"). This rejection is respectfully traversed.

A. CLAIM 1

Claim 1 recites:

A machine implemented method comprising:
accessing rows in a database table, wherein:
 each row in the database table corresponds to a dimension-value
 combination for a set of one or more of dimensions;
 the database table is composed of a plurality of segments, wherein each
 segment of the plurality of segments (a) corresponds to a different
 contiguous range of dimension-value combinations and (b)
 includes a different set of one or more rows, wherein at least one
 segment of the plurality of segments includes multiple rows;

the boundaries of each segment, of the plurality of segments, are established based on gaps in dimension-value combinations associated with rows stored in the database table;
the segment into which a row of the database table is stored is the segment that corresponds to the contiguous range that includes the dimension-value combination to which the row corresponds;
within each segment of the plurality of segments, rows of the database table are stored at locations based on the dimension-value combination to which the rows correspond; and
wherein accessing rows in the database table includes, in response to receiving a request that indicates a particular dimension-value combination:
using the particular dimension-value combination for determining a segment of the plurality of segments that stores a particular row that corresponds to the particular dimension-value combination;
and
accessing the particular row within the segment.

The amendment to Claim 1 makes clear that at least one segment of the recited database table includes multiple rows. Therefore, all segments in the plurality of segments cannot simply be equated to a row in the table of *Roccaforte*, as the Final Office Action alleges.

At least the above-bolded feature of Claim 1 is not taught or suggested by *Roccaforte*. That feature of Claim 1 recites: “the boundaries of each segment, of the plurality of segments, are established based on gaps in dimension-value combinations associated with rows stored in the database table.” A tile of *Roccaforte* is the most analogous element to the segment of Claim 1. However, the boundaries of a tile are not established based on gaps in dimension-value combinations associated with rows stored in a database table.

Because *Roccaforte* fails to teach or suggest all the features of Claim 1, Claim 1 is patentable over *Roccaforte*. Reconsideration and withdrawal of the rejection of Claim 1 under 35 U.S.C. § 102(b) is therefore respectfully requested.

B. CLAIM 34

Present Claim 34 recites:

A computer-readable storage medium that is readable by a database system, having stored therein at least:

- a database table containing a plurality of data items on the computer readable media that correspond to locations associated with at least one dimension value;
- wherein each data item of the plurality of data items is stored in the table in an order dictated by a dimension value combination to which said each data item corresponds, wherein the dimension value combination, to which said each data item corresponds, corresponds to one or more dimension columns defined for the database table; and

wherein the database table does not store values for, or that are derived from dimension values associated with, the one or more dimension columns. (emphasis added)

At least the above-bolded feature of Claim 34 are not taught or suggested by *Roccaforte*. In contrast to Claim 34, the fact table of *Roccaforte* stores replacement values, which are derived from dimension values associated with one or more dimension columns.

In the telephone interview, the Examiner indicated that issues related to the written description requirement under 35 U.S.C. § 112(1) may arise with the negative limitation of Claim 34. MPEP § 2173.05(i) states: “Any negative limitation or exclusionary proviso must have basis in the original disclosure” (emphasis added). That same section states that a **literal** basis for a negative limitation is **not** required: “Note that a lack of literal basis in the specification for a negative limitation may not be sufficient to establish a *prima facie* case for lack of descriptive support.”

Paragraph 39 and FIG. 4A of the present specification provides explicit support for the negative limitation “wherein the database table does not store values for...the one or more dimension columns.” FIG. 4A, which depicts the table of FIGs. 2 and 3 without the dimension columns, also provides basis for the negative limitation “wherein the database table does not store values...that are derived from dimension values associated with...the one or more dimension columns” because the table of FIG. 4A clearly does not store values that are derived

from dimension values associated with the dimension columns. Therefore, both negative limitations have basis in the original disclosure, as required by MPEP § 2173.05(i).

Based on the foregoing, because *Roccaforte* fails to teach or suggest all features of Claim 34, Claim 34 is patentable over *Roccaforte*. Reconsideration and withdrawal of the rejection of Claim 34 under 35 U.S.C. § 102(b) is therefore respectfully requested.

C. CLAIM 38

Claim 38 recites the same feature, of Claim 1 discussed above, that renders Claim 1 patentable over *Roccaforte*. Therefore, Claim 38 is patentable over *Roccaforte* for at least the same reasons discussed above for Claim 1. Reconsideration and withdrawal of the rejection of Claim 38 under 35 U.S.C. § 102(b) is therefore respectfully requested.

D. CLAIM 39

Claim 39 recites a similar feature of Claim 1 discussed above. Claim 39 recites “wherein the boundaries of each range, of the plurality of ranges, are determined based on gaps in dimension-value combinations associated with rows stored in the database table.” Claim 39 further recites that a segment is created for each range. Therefore, Claim 39 is patentable over *Roccaforte* for at least the same reasons discussed above for Claim 1.

Claim 39 further recites that the recited “plurality of ranges is determined such that the table includes rows that correspond to **every dimension-value combination** that belongs to each range of the plurality of ranges” (emphasis added) The cited portion of *Roccaforte* (i.e., page 9, lines 1 and 19-25) fails to teach or suggest that a plurality of ranges of dimension-value combinations is determined in such a way.

Because numerous features of Claim 39 are absent from *Roccaforte*, reconsideration and withdrawal of the rejection of Claim 39 under 35 U.S.C. § 102(b) is respectfully requested.

E. DEPENDENT CLAIMS

The remaining claims not discussed thus far are dependent claims, each of which depends (directly or indirectly) on one of Claims 1, 34, 38 or 39 discussed above. Each of the dependent claims is therefore patentable over *Roccaforte* for the reasons given above for the claim on which it depends. In addition, each of the dependent claims introduces one or more additional limitations that may independently render it patentable. However, due to the fundamental differences already identified and to expedite the positive resolution of this case, a separate discussion of all limitations that independently render the dependent claims patentable is not included at this time. The Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

III. CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

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